

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney
PAMELA T. JOHANN (CABN 145558)
Chief, Civil Division
ELIZABETH D. KURLAN (CABN 255869)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7298
Facsimile: (415) 436-6748
Elizabeth.Kurlan@usdoj.gov

Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

HAMED HAFEZY,

Plaintiff,

v.

MERRICK B. GARLAND, in his official
capacity as Attorney General, United States
Department of Justice, *et al.*,

Defendants.

Case No. 3:24-cv-04584 LJC

**STIPULATION TO EXTEND TIME FOR
DEFENDANTS' RESPONSE TO
PLAINTIFF'S COMPLAINT; AND ORDER**

The parties, through their undersigned attorneys, hereby stipulate to an extension of time for Defendants' response to Plaintiff's complaint. Defendants will file their response on or before October 16, 2024.

The parties further request a corresponding extension on the deadline for filing a motion for summary judgment under the Court's Immigration Mandamus Procedural Order. Dkt. No. 7. Currently, Defendants must file a motion for summary judgment by 120 days after the complaint was served, or November 28, 2024. In view of the agreed-upon extension for Defendants' response to the complaint, the parties request that Defendants must file their motion for summary judgment by December 16, 2024.

1 Dated: September 24, 2024

Respectfully submitted,¹

2 ISMAIL J. RAMSEY
3 United States Attorney

4 /s/ Elizabeth D. Kurlan
5 ELIZABETH D. KURLAN
6 Assistant United States Attorney
7 Attorneys for Defendants

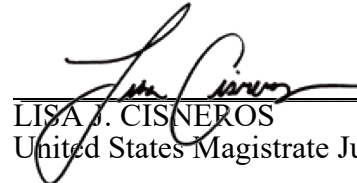
8 Dated: September 24, 2024

9 /s/ Zachary Nightingale
10 ZACHARY NIGHTINGALE
11 Van Der Hout LLP
12 Attorney for Plaintiff

13 **ORDER**

14 Pursuant to stipulation, IT IS SO ORDERED.

15 Date: September 25, 2024

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17 LISA J. CISNEROS
18 United States Magistrate Judge

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27 ¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all
28 signatories listed herein concur in the filing of this document.

DECLARATION OF ELIZABETH D. KURLAN

I, Elizabeth D. Kurlan, declare and state as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Northern District of California and counsel of record for the federal Defendants in the above-captioned action.

2. On July 29, 2024, Plaintiff filed a complaint in which he seeks adjudication of his parents' applications for immigrant visas. *See* Dkt. No. 1. Our office was served with the complaint on July 31, 2024.

3. On September 9, 2024, my office contacted Plaintiff's counsel regarding Defendants' request for an extension of time to prepare their response to the complaint, and Plaintiff consented to the request.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: September 9, 2024

/s/ Elizabeth D. Kurlan

ELIZABETH D. KURLAN

Assistant United States Attorney